

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

RALPH S. JANVEY, in his capacity as
Court-appointed receiver for the Stanford
Receivership Estate,

Plaintiff,

v.

GREENBERG TRAURIG, LLP; and
GREENBERG TRAURIG, PA,

Defendants.

§
§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 3:12-cv-04641-N

**GREENBERG TRAURIG’S UNOPPOSED MOTION
FOR SHORT EXTENSION OF THE MOTION DEADLINE AND
TO EXCEED SUMMARY JUDGMENT PAGE LIMIT**

The current Scheduling Order (Dkt. No. 262) imposes a deadline of July 15, 2019 for the filing of dispositive motions and motions to exclude expert testimony. Defendants Greenberg Traurig, LLP and Greenberg Traurig, PA (collectively, “Greenberg”) move for a one-week extension of this deadline to July 22, 2019. The parties have been diligently concluding expert discovery, but through no fault of either party, this discovery has bled into the first week of July, which compresses the time to prepare and finalize the motions.

The Receiver does not oppose this motion, so long as the time for his response is extended by the same additional week, a request Greenberg does not oppose.

Therefore, Greenberg asks the Court to grant a one-week extension for filing of dispositive motions and motions to exclude expert testimony, with the new deadline of July 22, 2019.

Greenberg also moves to exceed the page limit for summary judgment motions and seeks leave to file a summary judgment motion of no more than 75 pages. The issues in this case are

complex and the liability theories are numerous, requiring a greater than usual number of pages for explication.

The Receiver does not oppose this motion, so long as he is granted an equal number of additional pages for his response to Greenberg's motion, a request Greenberg does not oppose.

Therefore, Greenberg asks the Court for leave to file a summary judgment motion not to exceed 75 pages in length.

Respectfully submitted,

**FOGLER, BRAR, FORD, O'NEIL
& GRAY LLP**

By: /s/ Murray Fogler

Murray Fogler

mfogler@fbfog.com

Michelle E. Gray

mgray@fbfog.com

Robin O'Neil

roneil@fbfog.com

909 Fannin Suite 1640

Houston, Texas 77010

Telephone: (713) 481-1010

Facsimile: (713) 574-3224

BOIES SCHILLER FLEXNER LLP

Stuart H. Singer

ssinger@bsflfp.com

Sashi C. Bach

sbach@bsflfp.com

Pascual A. Oliu

poliu@bsflfp.com

401 East Las Olas Boulevard, Suite 1200

Fort Lauderdale, Florida 33301

Telephone: (954) 356-0011

Facsimile: (954) 356-0022

COWLES & THOMPSON, P.C.

Jim E. Cowles

jcowles@cowlesthompson.com

Sim Israeloff

sisraeloff@cowlesthompson.com

Charles A. Green

cgreen@cowlesthompson.com

901 Main Street, Suite 3900

Dallas, Texas 75202

Telephone: (214) 672-2000

Facsimile: (214) 672-2347

Counsel for Defendants Greenberg Traurig, LLP and Greenberg Traurig, PA

CERTIFICATE OF CONFERENCE

I certify that I have conferred with counsel for the Receiver, who does not oppose this motion as long as the time for his response is extended by one week and the page limit for his summary judgment response is extended to 75 pages. Greenberg does not oppose either request.

By: /s/ Murray Fogler
Murray Fogler

CERTIFICATE OF SERVICE

I certify that this pleading was served on all counsel of record in accordance with the rules of procedure.

By: /s/ Murray Fogler
Murray Fogler